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(additional counsel listed in Exhibit A)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**PERA'S RESPONSE TO THE COURT'S
MEMORANDUM OF MAY 30, 2024**

1 Lead Plaintiff Public Employees Retirement Association of New Mexico (“PERA”) hereby
2 submits this response to the Court’s memorandum of May 30, 2024.

3 The Court requested from PERA “a current count (number of claims, not dollar amounts or
4 identification of the claimants) that are included in the 33rd Omnibus Objection, including any who
5 opted to align themselves with PERA in addition to the number of claimants identified on Exhibit A
6 to the Stipulation Regarding Motion of Lead Plaintiff Pursuant to B.L.R. 90006-1 to Extend Time to
7 File Response to Certain Claim Objections. (Dkt. 14341-1).”

8 To date, 107 claims have opted to align themselves with PERA:

- 9 • The 82 claims Reorganized Debtors listed in Exhibit A (“Claims to Be Disallowed
10 and Expunged”) to Reorganized Debtors’ Thirty-Third Securities Omnibus Claims
11 Objection to PERA and Securities Act Plaintiffs’ TAC, Including to Certain
12 Claimants that Adopted the TAC (Dkt. 14200);
- 13 • The 21 claims identified on Exhibit A to the Stipulation Regarding Motion of Lead
14 Plaintiff Pursuant to B.L.R. 9006-1 to Extend Time to File Response to Certain
15 Claim Objections (Dkt. 14341-1) (the “Stipulation”), with respect to which the
16 Reorganized Debtors consented; and
- 17 • The 4 claims by securities claimants who have opted to align themselves with PERA
18 since the Stipulation was filed.

19 In addition, PERA intends to seek discovery from the Reorganized Debtors, and more
20 particularly the Reorganized Debtors’ claims agent, in connection with PERA’s pending
21 Bankruptcy Rule 7023 motion as it relates to class certification. Specifically, PERA will be seeking
22 information concerning those securities claims that were not included in the Reorganized Debtors’
23 sufficiency objections and that are still pending. Such information is needed in order for PERA to
24 contact those securities claimants to determine if they are interested in aligning themselves with
25 PERA and adopting the PERA complaint in connection with merits-based arguments relating to the
26 sufficiency objections. Obtaining this information is consistent with the Court’s suggestion that
27 counsel for PERA contact securities claimants to determine if they are interested in joining PERA’s
28 position. (See February 9, 2024 Transcript of Proceedings (ECF No. 14316) at 29:21-30:10.)

1 Dated: June 21, 2024

Respectfully submitted,

2 **LABATON KELLER SUCHAROW LLP**

3 By: /s/ Michael P. Canty
4 Michael P. Canty (*pro hac vice*)
5 *Lead Counsel to Securities*
Lead Plaintiff and the Class

6 - and -

7 **MICHELSON LAW GROUP**

8 *Local Bankruptcy Counsel to Securities Lead*
Plaintiff and the Class

9 - and -

10 **LOWENSTEIN SANDLER LLP**

11 *Special Bankruptcy Counsel to Securities Lead*
12 *Plaintiff and the Class*

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15 **CUMBERLAND & GREEN LLP**

16 *Liaison Counsel for the Class*

17 - and -

18 **ROBBINS GELLER RUDMAN & DOWD LLP**

19 *Counsel for the Securities Act Plaintiffs*

20 - and -

21 **VANOVERBEKE, MICHAUD & TIMMONY, P.C.**

22 *Additional Counsel for the Securities Act Plaintiffs*

EXHIBIT A

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